

NOURSE & BOWLES, LLP
Attorneys for Defendants
One Exchange Plaza
At 55 Broadway
New York, NY 10006-3030
(212) 952-6200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Hughes, Hooker & Co. and :
Hughes, Hooker (Correspondents) S.A. : 04 CV 01859 (SHS)
Plaintiffs, :
- against - :
American Steamship Owners Mutual :
Protection and Indemnity Association, Inc. :
Shipowners Claims Bureau :
Joseph E.M. Hughes :
Thomas J. McGowan :
Vincent J. Solarino :
Defendants.
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**NOTICE OF DEFENDANTS' RENEWED MOTIONS
FOR ORDERS STAYING THIS ACTION
PENDING ARBITRATION IN LONDON**

PLEASE TAKE NOTICE that, upon the affidavit of Lawrence J. Bowles sworn to on February 28, 2005 together with the exhibits annexed thereto, and the accompanying memorandum of law, defendant American Steamship Owners Mutual Protection & Indemnity Association, Inc. (the "American Club") will renew its motion to this Court on April 11, 2005, or as soon thereafter as counsel can be heard for an Order

under Sections 3 and 206 of the Federal Arbitration Act, 9 U.S.C. §1 *et seq.* staying plaintiffs' action as against it pending arbitration in London with the named plaintiffs, who, with the American Club were the only parties to the contract in dispute and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, upon the same accompanying papers and at the same time and place, defendants Shipowners Claims Bureau ("SCB"), Joseph E.M. Hughes ("Mr. Hughes"), Thomas McGowan ("Mr. McGowan"), Vincent J. Solarino ("Mr. Solarino"), who are not parties to the contract in dispute (collectively "the non-party defendants") will move the Court for an Order staying this action as against them pending resolution of the London arbitration between plaintiffs and the American Club and for such other relief as the Court deems just and proper.

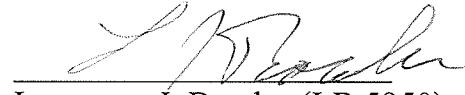
PLEASE TAKE FURTHER NOTICE THAT any papers responding to the above motions must be served on Nourse & Bowles, LLP, attorneys for defendants on the schedule included in the Court's Order dated February 4, 2005 (which order inadvertently refers to these motions as summary judgment motions).

PLEASE TAKE FURTHER NOTICE THAT under the Court's rules, all motion papers must be filed at the same time. Accordingly, please serve the original and two copies of any papers responding to these motions on defendants' attorneys on the

schedule included in the Court's Order dated February 4, 2005, and they will file both plaintiffs' and defendants' papers with the Court on or before April 11, 2005.

Dated: New York, New York
 February 28, 2005

NOURSE & BOWLES, LLP
Attorneys for Defendants
By:



Lawrence J. Bowles (LB 5950)
One Exchange Plaza
At 55 Broadway
30th Floor
New York, New York 10006-3030
(212) 952-6200

TO: James M. Maloney, Esq.
33 Bayview Avenue
Port Washington, New York 11050